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5 Attorneys for Plaintiff
6 United States of America

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 **United States of America,**
11 Plaintiff,
12 v.

13 **Mark L. Bausch, aka Mark Eting,**
14 **Alan W. Rodrigues,**
14 **David Bergstrom,**
15 **Jonas Bowen,**
15 **Rachel Glaser,**
16 **Lee Panelli, and**
16 **Craig Rudolph,**

2:14-cr-0399-KJD-PAL

17 **Defendants.**

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20 **Stipulation For Protective Order**

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28 **IT IS HEREBY STIPULATED AND AGREED** between the parties, Daniel G. Bogden,
United States Attorney for the District of Nevada, Daniel R. Schiess, Assistant United States
Attorney, and Russell M. Aoki, Coordinating Discovery Attorney, that this Court issue an Order
protecting from disclosure to the public any discovery documents containing the personal
identifying information such as social security numbers, driver license numbers, dates of birth,
or addresses, of participants, witnesses and victims in this case. Such documents shall be
referred to hereinafter as "Protected Documents." The parties state as follows:

1 1. Protected Documents which will be used by the government in its case in chief
2 include personal identifiers, including social security numbers, driver license numbers, dates of
3 birth, and addresses, of participants, witnesses, and victims in this case.

4 2. Discovery in this case is voluminous. During the execution of search warrants,
5 the FBI recovered about 400 boxes of documents and about 100 computers. Many of the
6 documents include personal identifiers. Redacting the personal identifiers of participants,
7 witnesses, and victims is impractical due to the volume of discovery.

8 3. The United States agrees to provide or make available Protected Documents
9 without redacting the personal identifiers of participants, witnesses, and victims.

10 4. Access to Protected Documents will be restricted to persons authorized by the
11 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
12 and secretaries employed by the attorney(s) of record and performing on behalf of defendant
13 including Russell M. Aoki, the Coordinating Discovery Attorney, his staff and the third party
14 technology/litigation support vendors who work under his supervision.

15 5. The following restrictions will be placed on defendant, defendant's attorney(s),
16 Mr. Aoki, and the above-designated individuals unless and until further ordered by the Court.
17 Defendants, defendants' attorneys, Mr. Aoki, and the above-designated individuals shall not:

- 18 a. make copies for, or allow copies of any kind to be made by any other person of
19 Protected Documents, except (1) copies of the documents made available at the
20 FBI for their inspection may be made for distribution to all defense attorney's,
21 Mr. Aoki and Mr. Aoki's staff;
- 22 b. allow any other person to read Protected Documents; and,
- 23 c. use Protected Documents for any other purpose other than preparing to defend
24 against the charges in the Superseding Indictment or any further superseding
25 indictment arising out of this case.

26 6. Defendant's attorney(s) and Mr. Aoki shall inform any person to whom
27 disclosure may be made pursuant to this order of the existence and terms of this Court's order.

1 7. The requested restrictions shall not restrict the use or introduction as evidence of
2 discovery documents containing personal identifying information such as social security
3 numbers, driver license numbers, dates of birth, and addresses during the trial of this matter.

4 8. Upon conclusion of this action, defendant's attorney(s) and Mr. Aoki shall return
5 to government counsel or destroy and certify to government counsel the destruction of all
6 discovery documents containing personal identifying information such as social security
7 numbers, drivers\ license numbers, dates of birth, and addresses within a reasonable time, not to
8 exceed thirty days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

DANIEL R. SCHIESS
Assistant United States Attorney

RUSSELL M. AOKI
Coordinating Discovery Attorney

ORDER

IT IS SO ORDERED this 10th day of March, 2015.

Terry A. Steen
UNITED STATES MAGISTRATE JUDGE